

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

Tashia Kennedy, Tawanda Woody,)	Civil Action No.
Tyneshia Dodd, Cierria Jenkins, and)	
Cassondra Grayson,)	
)	
Plaintiffs,)	PLAINTIFFS' RULE 26.01
)	INTERROGATORY RESPONSES
vs.)	
)	
Monroe Group, Ltd., Steele Belle Meade,)	
LLC, and Vernice Dimiati,)	
)	
Defendants.)	
)	

Plaintiffs Tashia Kennedy (“Kennedy”), Tawanda Woody (“Woody”), Tyneshia Dodd (“Dodd”), Cierria Jenkins (“Jenkins”), and Cassondra Grayson (“Grayson”) (collectively, “Plaintiffs”), by and through their undersigned attorneys, hereby respond to the District of South Carolina Federal Local Rule 26.01 Interrogatories as follows:

- (A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: Not applicable.

- (B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiffs’ equitable claims may be resolved by the Court, but Plaintiffs have requested a jury trial for their claims at law.

- (C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: Not applicable.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: The events giving rise to this dispute occurred in this Division and Defendants Steele Belle Meade, LLC and Vernice Dimiati may be found in this Division.

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.¹

ANSWER: Not applicable.

[signature page follows]

¹ This information is required in addition to completion of the “related cases” block on the JS44 Civil Cover Sheet. Although the Civil Cover Sheet requires only that parties disclose *pending* related cases, this interrogatory and this District’s assignment procedures require disclosure of *any prior or pending* related case whether civil or criminal. Therefore, both categories should be disclosed in response to this interrogatory as well as on the JS 44 Civil Cover Sheet.

Respectfully submitted,

By: /s/ Giles M. Schanen, Jr.

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Greenville, South Carolina
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